

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SUSAN E. EDWARDS	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2012-00282
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 26, 2012. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. a. Provide copies of all bills due for all energy services rendered from January 1, 2007 to March 31, 2009 at the service address of 4207 W. Market Street, Louisville, Kentucky 40212.

b. Provide copies of all bills due for all energy services rendered from January 1, 2007 to October 31, 2007 at service address of 2313 West Chestnut Street, Louisville, Kentucky 40212.

c. If the account at service address of 2313 West Chestnut Street Louisville, Kentucky 40212 was delinquent during the time period from January 1, 2007 to October 31, 2007, provide the last date the account was paid in full and current.

2. Refer to the information provided in Exhibit A in the LG&E's Answer to Commission Staff's Order to Satisfy or Answer dated July 5, 2012, filed July 16, 2012, that contains a copy of the bill with the due date of 05/31/11, in the amount of \$2,261.42. Explain mathematically how the amount of \$2,261.42 was determined.

3. For the period beginning January 1, 2007 through the present, provide the following information for the electric service provided at 4207 W. Market Street, Louisville, Kentucky 40212

a. Identify the type of meter(s) located at the service address listed above.

b. Provide the date(s) the meter(s) were installed and the date(s) placed in service.

c. Provide the date(s) the meter(s) were inspected by LG&E staff or representative(s).

d. Provide the date(s) the meter(s) were tested by LG&E staff or representative(s) and the results of the test(s).

e. Provide the actual dates of when the meter(s) were read for billing or other purposes, exclusive of the information provided in Exhibit B of LG&E's Answer to Commission Staff's Order to Satisfy or Answer dated July 5, 2012, filed July 16, 2012.

f. Identify and explain any unusual circumstances encountered and reported related to the meter(s) during the time period listed above.

g. Provide the date(s) when service was disconnected at the service address listed above.

4. a. Identify any changes to LG&E's customer billing and accounting system from January 1, 2007 to present.

b. Identify any changes to LG&E's accounting procedures relative to delinquent accounts from January 1, 2007 to present.

5. Provide a list by date of all cash payments made by the Complainant and any other source(s) for energy services rendered from January 1, 2007 to present, exclusive of the information provided in Exhibit B of the LG&E's Answer to Commission Staff's Order to Satisfy or Answer, dated July 5, 2012, filed July 16, 2012.

6. 807 KAR 5:006, Section 9 governs a utility's conduct, correspondence and record retention regarding customer complaints to the utility.

a. Provide a record of all communication of any unresolved complaints between the Complainant and LG&E arising since October 2007.

b. Provide a copy of all communication addressing any resolved complaints within the last two (2) years.

7. 807 KAR 5:006, Section 10 governs bill adjustments for gas, electric and water utilities.

a. Refer to 807 KAR 5:006, Section 10 (3), (4), (5) and (6). State whether or not LG&E complied with these subsections of the regulation relative to all monthly energy usage and billing for the service address of the Complainant for the period October 2007 to the present.

b. Explain the response to part (a) in relation to each referenced subsection of the regulation.

8. Refer to 807 KAR 5:006, Section 18 which provides, in relevant part, that:

(1) Each utility shall make a test of any meter upon written request of any customer if the request is not made more frequently than once each twelve (12) months. The customer shall be given the opportunity to be present at the request tests. If the tests show that the meter was not more than two (2) percent fast, the utility may make a reasonable charge for the test. The amount of the charge shall be approved by the commission and set out in the utility's filed tariff.

(2) After having first obtained a test from the utility, any customer of the utility may request a meter test by the commission upon written application. Such request shall not be made more frequently on one (1) meter than once each twelve (12) months.

Explain whether the Complainant was advised that she could request the Commission to test the electric and gas meters.

9. Refer to LG&E's Tariff, P.S.C. Electric No. 8, Original Sheet No. 101.1 effective August 1, 2010.

a. State whether or not LG&E complied with the terms and conditions relative to all monthly energy usage and billing for the service address of the Complainant for the period August 1, 2010 to the present.

b. Explain the response to part (a.)

c. For the billing period from April 1, 2009 to July 31, 2010, provide an explanation of whether the previous Commission approved Tariff(s) regarding Terms and Conditions for Monitoring of Customer Usage would have addressed the high electric energy usage that occurred during the billing periods of January 2010 to March 2010.

d. Explain what LG&E considers unusual deviations in individual residential customer electric consumption and how such is determined.

10. a. Provide by month, the average monthly residential electric usage, based on the test year of the last Commission approved base rate case.

b. Based on the Complainant's monthly electric usage from copies of bills provided in response to the complaint by LG&E, explain whether LG&E has ever

contacted the Complainant as to performing an energy audit or to discuss available residential demand-side management programs.

11. On page 3 of the complaint filed with the Commission on June 27, 2012, the Complainant states, "In result I was charged late fees & other charges, including gas, when these bills came out I had NEVER had gas in my home at the address 4207 W. Market St. & was also told by Ms. Alexander that I could not get any residential gas services, because of this outstanding debt."

a. If the Complainant's statement is correct that she never had gas service at her current address, explain why there were gas charges appearing on her bills for the billing period from February 2011 to April 2011.

b. Provide all documentation to verify the Complainant requested and received gas service for the period listed in part a.

c. Provide the date(s) when the gas meter(s) were read from January 2011 to May 2011.



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DATED OCT 10 2012

cc: Parties of Record

Case No. 2012-00282

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